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8	BEFORE THE PHYSICIAN'S ASSISTANT EXAMINING COMMITTEE
9	BOARD OF MEDICAL QUALITY ASSURANCE
10	DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA
11	In the Matter of the Accusation ) NO. D-3437
12	Against: ) ACCUSATION
13	JESSE J. JACQUEZ ) 1740 Freeman Avenue, #4 )
14	Long Beach, CA 90804 )
15	Physician's Assistant ) License No. PA10031 )
16	Respondent. )
17	)
18	Complainant, Ray E. Dale, alleges as follows:
19	l. He is the executive officer of the Physician's
20	Assistant Examining Committee of the Board of Medical Quality
21	Assurance, Department of Consumer Affairs, State of California,
22	(hereinafter the "Committee") and brings this accusation solely
23	in said official capacity.
24	2. On or about December 9, 1976, respondent
25	Jesse J. Jacquez (hereinafter "respondent") was issued
26	physician's assistant license number PA10031 by the Committee.
27	At all times pertinent hereto, said license was and currently is
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in full force and effect.

- 3. Business and Professions Code sections 3527(a) and 3528 provide that the Committee may order the suspension or revocation of, or the imposition of probationary conditions upon a physician's assistant license for unprofessional conduct, which includes but is not limited to a violation of the chapter, of the Medical Practice Act or of regulations promulgated thereunder. (Hereinafter, all statutory references are to the Business and Professions Code, unless otherwise indicated.)
- 4. Section 3531, in conjunction with section 490, authorizes the Committee to discipline a physician's assistant license for conviction of a felony or any offense substantially related to the qualifications, functions or duties of the licentiate's business or profession.
- 5. Respondent's licensure is subject to discipline pursuant to section 3531, in conjunction with section 490, in that he has been convicted of an offense which is substantially related to the qualifications, functions or duties of the business or profession of a physician's assistant. The facts and circumstances are as follows:
  - A. In a matter before the United States District Court, Central District of California, entitled "United States v. Jesse Jose Jacquez," case number CR 83-88(A)-ER, on or about April 26, 1983, respondent was convicted of and sentenced for violation of Title 18 United States Code section 641, in that he knowingly and willfully converted to his own use property of the United States.

B. Said offense occurred in conjunction with respondent's employment at the Latin Family Medical Clinic, 5425 North Figueroa Street, Los Angeles, California, during which respondent accepted payment including but not limited to on or about October 19, 1982 in exchange for the referral of laboratory work.

WHEREFORE, Complainant requests that the Committee hold a hearing on the matters alleged herein, and that, following said hearing, the Committee issue a decision:

- Suspending or revoking physician's assistant license number PA10031 heretofore issued to respondent Jesse J. Jacquez; and/or
  - 2. Taking such other action as it deems proper.

    DATED: December 4, 1985

RAY E. DALE

Executive Officer
Physician's Assistant
Examining Committee

Board of Medical Quality Assurance Department of Consumer Affairs

Complainant

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